

1 PHILLIP A. TALBERT
Acting United States Attorney
2 KEVIN C. KHASIGIAN
Assistant U. S. Attorney
3 501 I Street, Suite 10-100
Sacramento, CA 95814
4 Telephone: (916) 554-2700
5 Attorneys for the United States
6
7

8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$14,390.00 IN
U.S. CURRENCY,

15 JUGGERNAUT JTE15 TACTICAL RIFLE,

16 MOSSBERG 590 SHOTGUN,

17 BLACK ACES TACTICAL PRO SERIES L
18 SHOTGUN,

19 GLOCK 19 PISTOL, AND

20 SPRINGFIELD ARMORY 1911 PISTOL,

21 Defendants.
22

2:21-MC-00172-MCE-CKD

**STIPULATION AND ORDER EXTENDING TIME
FOR FILING A COMPLAINT FOR
FORFEITURE AND/OR TO OBTAIN AN
INDICTMENT ALLEGING FORFEITURE**

23 It is hereby stipulated by and between the United States of America and potential claimant Robert
24 Frandsen (“claimant”), appearing *in propria persona*, as follows:

25 1. On or about April 11, 2021, claimant filed a claim in the administrative forfeiture
26 proceeding with the Drug Enforcement Administration with respect to the Approximately \$14,390.00 in
27 U.S. Currency (hereafter “defendant currency”), Juggernaut JTE15 Tactical Rifle, Mossberg 590
28 Shotgun, Black Aces Tactical Pro Series L Shotgun, Glock 19 Pistol, and Springfield Armory 1911 Pistol

1 (hereafter “defendant firearms”) which were seized on January 13, 2021.

2 2. The Drug Enforcement Administration has sent the written notice of intent to forfeit
3 required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any
4 person to file a claim to the defendant currency and defendant firearms under 18 U.S.C. § 983(a)(2)(A)-
5 (E), and no person other than claimant has filed a claim to the defendant currency and defendant firearms
6 as required by law in the administrative forfeiture proceeding.

7 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
8 forfeiture against the defendant currency and defendant firearms and/or to obtain an indictment alleging
9 that the defendant currency and defendant firearms are subject to forfeiture within ninety days after a
10 claim has been filed in the administrative forfeiture proceeding, unless the court extends the deadline for
11 good cause shown or by agreement of the parties. That deadline was July 10, 2021.

12 4. By Stipulation and Order filed July 19, 2021, the parties stipulated to extend to August 9,
13 2021, the time in which the United States is required to file a civil complaint for forfeiture against the
14 defendant currency and defendant firearms and/or to obtain an indictment alleging that the defendant
15 currency and defendant firearms are subject to forfeiture.

16 5. By Stipulation and Order filed August 11, 2021, the parties stipulated to extend to
17 September 8, 2021, the time in which the United States is required to file a civil complaint for forfeiture
18 against the defendant currency and defendant firearms and/or to obtain an indictment alleging that the
19 defendant currency and defendant firearms are subject to forfeiture.

20 6. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend
21 to October 8, 2021, the time in which the United States is required to file a civil complaint for forfeiture
22 against the defendant currency and defendant firearms and/or to obtain an indictment alleging that the
23 defendant currency and defendant firearms are subject to forfeiture.

24 ///

25 ///

26 ///

27 ///

28 ///

1 7. Accordingly, the parties agree that the deadline by which the United States shall be
2 required to file a complaint for forfeiture against the defendant currency and defendant firearms and/or to
3 obtain an indictment alleging that the defendant currency and defendant firearms are subject to forfeiture
4 shall be extended to **October 8, 2021**.

5 Dated: 9/7/2021

PHILLIP A. TALBERT
Acting United States Attorney


7 By: /s/ Kevin C. Khasigian
8 KEVIN C. KHASIGIAN
Assistant U.S. Attorney

10 Dated: 9/7/2021

11 /s/ Robert Frandsen
ROBERT FRANDSEN
Potential Claimant
Appearing *in propria persona*
13 (Signature authorized by phone)

16 IT IS SO ORDERED.

18 Dated: September 10, 2021

19 
20 MORRISON C. ENGLAND, JR.
21 SENIOR UNITED STATES DISTRICT JUDGE
22
23
24
25
26
27
28